

THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA

vs.

Cr. 04-10160-WGY

JUAN ROSARIO, ET AL

MOTION TO EXTEND TIME WITHIN WHICH TO
RESPOND TO PRESENTENCE REPORT

Now comes the defendant Ramon Villa in the above case and respectfully requests that the time within which his counsel must respond to the Pretrial Sentence Report be extended from August 22, 2005 to September 6, 2005 for the following reasons:

1. The defendant was not interviewed by the Probation Department until July 21, 2005. This delay was due, in large part, to the difficulty in securing an interpreter and arranging transportation for the defendant from MCI Cedar Junction to the Courthouse for the interview.
2. The Presentence Report was not received by defendant's counsel until August 11, 2005.
3. The Presentence Report is 35 pages in length and makes frequent reference to persons other than the defendant.
4. Counsel has made personal vacation plans on several days between the date of this motion and August 22, 2005.
5. Counsel will arrange to meet with the defendant and an interpreter to review the Presentence Report as soon as possible
6. The defendant does not speak English and it will probably require more than one day with the aid of an interpreter review the Presentence Report with counsel and after the defendant has reviewed it counsel will need time to prepare and submit his objections, if any.

It is submitted that counsel will be able to submit his objections by September 6, 2005 and that the requested extension is in the best interests of justice.

Respectfully submitted
Raymon Villa
By his attorney,

/s/ Paul F. Markham